

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

THE SHANE GROUP INC.; BRADLEY
A. VENEGER; SCOTT STEELE;
MICHIGAN REGIONAL COUNCIL OF
CARPENTERS EMPLOYEE BENEFITS
FUND; ABATEMENT WORKERS
NATIONAL HEALTH AND WELFARE
FUND; and MONROE PLUMBERS AND
PIPEFITTERS LOCAL 671 WELFARE
FUND,

Case No. 2:10-cv-14360

Honorable Denise Page Hood

Plaintiffs,

v.

BLUE CROSS AND BLUE SHIELD OF
MICHIGAN,

Defendant.

DECLARATION OF PERRIN RYNDERS

Perrin Rynders declares that he would testify as follows if called as a witness in this matter:

1. I am a partner with the law firm Varnum LLP. I graduated from the University of Michigan Law School, *cum laude*, in 1985 and have been practicing law with Varnum continually since then. My practice involves complex litigation on behalf of business entities and individuals.

2. In this matter, Varnum filed objections to the Final Approval of Settlement and Plan of Allocation on behalf of the following 21 sponsors of ERISA welfare benefit plans:

- a. ADAC Automotive
- b. Baker College
- c. Borroughs Corporation
- d. Eagle Alloy Inc.
- e. Floracraft Corporation
- f. Four Winds Casino Resort
- g. Frankenmuth Bavarian Inn Inc.
- h. Gemini Group Inc.
- i. Gill-Roy's Hardware/Morgan Properties LLC
- j. Grand Traverse Band of Ottawa and Chippewa Indians
- k. Huizenga Group
- l. Kent Companies Inc.
- m. Magna International of America, Inc.
- n. Master Automatic Machine Company Inc.
- o. Petoskey Plastics Inc.
- p. SAF-Holland USA Inc.
- q. Terryberry Company LLC
- r. Thelen Inc.
- s. Trillium Staffing Solutions
- t. Truss Technologies
- u. Wade Trim Group Inc.

3. I am lead counsel for those 21 objectors in this matter, and I participated in a hearing on December 10, 2020 conducted by this Honorable Court.

4. As I stated on the record during the referenced hearing, each of Varnum's 21 clients identified above authorized Varnum, in writing, to settle those objections as set forth in the Proposed Order Approving Settlement with Varnum

Group Pursuant to Rule 23(e)(5)(B), which was presented to this Court prior to the referenced hearing.

5. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Date: December 11, 2020

/s/ Perrin Rynders

Perrin Rynders